



TEXAS CATTLE FEEDERS ASSOCIATION

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May 26, 2004

VIA FAX 202/720-5631

Angela C. Snyder
Office of the Deputy Administrator
Poultry Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW
STOP 0256, Room 3932—South
Washington, DC 20250

RE: Docket No. PY-02-006: "Proposed Rule to Exempt Organic Producers from Assessment by Research and Promotion Programs"
April 26, 2004 Issue of *FEDERAL REGISTER*, Pages 22689-22702

Texas Cattle Feeders Association (TCFA) appreciates the opportunity to comment on the proposed rules. TCFA represents the cattle feeding industry in Texas, Oklahoma and New Mexico, an area that produces 30% of the total U.S. fed beef production. Our comments will be limited to the proposed rules on beef promotion and research.

We strongly believe that the exemption should only apply to "A person who produces and markets solely 100 percent organic products, and who does not produce any conventional or non-organic products, shall be exempt from the payment of the promotion and research assessment with respect to any cattle or beef and beef products that are produced on a certified organic farm as defined in section 2103 of the Organic Foods Production Act of 1990." Thus, the producer must produce the beef on a certified organic farm and market the beef to be eligible for the exemption.

We support that "produce" for this program for beef be defined as "produce means to raise, feed, slaughter and process cattle for beef." Produce must include all steps in production and processing to qualify for the exemption.

We support the requirement that a person must annually renew their exemption so that it can be determined that they are in compliance with the requirements to be a certified organic farm.

TCFA does not support including imported beef in the exemption because the intent of the law was to provide exemptions only for domestic producers of organic products as defined in section 2103 of the Organic Foods Production Act of 1990.

Sincerely,

Richard McDonald
President & CEO

